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January 25, 1999

Magalie Roman Salas
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, D.C. 20554


**Re: Federal-State Joint Board on Universal Service
CC Docket No. 96-45**

Dear Ms. Salas:

On behalf of Western Wireless Corporation, I am enclosing for filing the Reply Comments of Western Wireless Corporation on the Further Notice of Proposed Rulemaking in the proceeding referred to above. These Comments are filed in response to the Commission's Further Notice of Proposed Rulemaking, FCC 98-278 (released October 26, 1998).

Please contact me if you have any questions.

Respectfully submitted,



Michele C. Farquhar
Counsel for Western Wireless Corporation

Enclosures

cc: Parties on attached service list
ITS, Inc.

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the Matter of

Federal-State Joint Board
on Universal Service

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CC Docket No. 96-45

**REPLY COMMENTS OF WESTERN WIRELESS CORPORATION
ON FURTHER NOTICE OF PROPOSED RULEMAKING**

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**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

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| |) | |
| Federal-State Joint Board |) | CC Docket No. 96-45 |
| on Universal Service |) | |
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**REPLY COMMENTS OF WESTERN WIRELESS CORPORATION
ON FURTHER NOTICE OF PROPOSED RULEMAKING**

Western Wireless Corporation ("Western Wireless"), by its attorneys, hereby submits its Reply Comments in response to the comments filed on the Further Notice of Proposed Rulemaking, FCC 98-278, released October 26, 1998 ("FNPRM"), in the above-captioned proceeding.

I. INTRODUCTION AND SUMMARY

Recent developments have made it even more critical for the Commission to redouble its efforts to eliminate barriers to competitive entry in the universal service support system. Western Wireless is committed to providing consumers in rural and high-cost areas with a competitive alternative to incumbent local exchange carriers' ("ILECs") basic local phone services. Our recent experience shows that introducing local competition in rural markets – as anticipated and eagerly awaited by the framers of the Telecommunications Act of 1996 ("1996 Act") – is much more difficult than one might think. For example, in the rural area of Regent, North Dakota, Western Wireless introduced a pioneering new Wireless

Residential Service in early January 1999, only to have its interconnection trunk and local phone numbers summarily and unilaterally disconnected by the local ILEC a few days later. While Western Wireless has sought relief from the ILEC's unlawful and outrageous action from both the North Dakota Public Service Commission and the FCC, 1/ this episode is characteristic of the difficulties new entrants in rural areas may face.

In addition, for purposes of this proceeding, wireless carriers and other prospective new entrants in rural areas face a number of universal service-related regulatory barriers. Western Wireless proposed solutions to these problems in our initial comments on the FNPRM ("Initial Comments"):

- Rural ILECs continue to receive substantial implicit subsidies over and above the explicit distributions from the universal service fund. Ultimately, implicit subsidies should be eliminated and all support should be explicit, portable, and competitively neutral. But in the meantime, as long as implicit subsidies persist, competitive eligible telecommunications carriers ("ETCs") should receive an equivalent measure of support.
- The FCC's rules appear not to fund competitive ETCs as promptly as ILECs. These rules must be fixed or clarified.
- The forward-looking cost model should establish funding based upon the most cost-effective technology for serving a geographic area, not simply upon the cost of providing wireline service.
- The Commission must monitor, and when necessary preempt, state barriers to entry.

1/ *Western Wireless Corp. v. Consolidated Tel. Coop.*, (N.D. PSC, filed January 15, 1999) (complaint and motion for preliminary injunctive relief filed); *Western Wireless Corp. v. Consolidated Tel. Coop.*, (FCC, filed January 15, 1999) (complaint and motion for preliminary injunctive relief filed).

- It is unclear whether CMRS providers may collect access charges from IXC's, and FCC rules preclude them from filing tariffs. The Commission should clarify that CMRS providers are entitled to access charges, and should permit them to file tariffs.
- The Commission should refrain from imposing local usage requirements on ETC's, because such requirements would be unnecessary and violate the goals of competitive and technological neutrality.

In this Reply, Western Wireless responds to several commenters that address Western Wireless' Petition for Clarification or Rulemaking seeking that the Commission interpret or amend its rules to fund competitive ETC's on an equivalent basis with ILEC's. 2/ Western Wireless also joins a number of parties, including Ameritech and Sprint PCS, in urging the Commission not to impose any local usage requirement but rather allow forces in the marketplace to drive "basic service" packages offered by ETC's. Finally, Western Wireless concurs with CTIA regarding the method CMRS providers should use to compute their interstate share of revenues for universal service contributions.

II. UNIVERSAL SERVICE POLICY MUST PROMOTE LOCAL COMPETITION IN RURAL AREAS

A. The Commission Must Maintain Its Commitment to Competitive Neutrality

The Commission must continue to adhere to the goals of competitive and technological neutrality, 3/ and should ensure that consumers in rural/high-cost

2/ Western Wireless still intends to file that HAI Wireless Cost Model discussed in its Initial Comments at 15 on January 26, 1999.

3/ FNPRM at ¶¶ 42-45.

areas have opportunities to select telecommunications services from a range of competing providers that are reasonably comparable to consumers in urban areas. 4/ Not only should the Commission firmly reject calls to abandon this core goal, 5/ it should also take expedited action to remove barriers to competitive entry that exist in its current universal service rules and policies. For example, ILECs operating in high-cost areas continue to receive substantial implicit subsidies over and above the explicit distributions from the universal service fund, but these implicit subsidies are generally unavailable to competitive entrants. The specific elements and monetary amount of these implicit subsidies are extremely difficult to measure, but include excessive access charges, 6/ above-cost business rates, rate averaging, and low-interest loans from the RUS. We discussed these and other barriers to entry, and solutions to these problems, in our Initial Comments.

4/ Initial Comments at 4 (*citing* 47 U.S.C. § 254(b)(3)); *see also* Sprint PCS at 8-9; US Cellular at 13; Omnipoint at 5-6; CTIA at 14.

5/ TDS at 2-3; NTCA at 4-5 ("Universal service, not competitive neutrality, is the objective of Section 254."). We do not dispute NTCA's statement that "the focus should be on the consumer," *id.* at 5, but the best way to guarantee benefits to consumers, as the Commission has confirmed on many occasions, is through local competition.

6/ Indeed, a recent statistical survey produced by the Rural Utilities Service of the United States Department of Agriculture ("RUS") demonstrated that rural telephone companies that borrow from the RUS receive only 28% of their revenues from local network services, whereas a full 64% of their revenues are attributable to network access and long distance, and 8% of revenues are from miscellaneous sources. 1997 Statistical Report Rural Telecommunications Borrowers, Rural Utilities Service, United States Department of Agriculture (August 1998) at 15.

B. The Commission Must Ensure That Competitive ETCs Can Receive Support as Promptly as ILECs

The Commission should expeditiously remedy the apparent inequity in its rules which gives ILECs support funding right away based on current data, but that delays new entrants' support for up to two years and bases funding on data that are seriously out of date. 7/ A number of commenters support Western Wireless' call to remedy this problem, which places competitive ETCs at a serious disadvantage vis-à-vis ILECs. 8/ Centennial Cellular's experience is particularly instructive: although it is one of the first wireless carriers in a high-cost area (Puerto Rico) to have been designated as an ETC, it cannot qualify to receive funding for a whole year after it entered that market. 9/

On the other hand, the ILECs that support retaining this rule simply appear to enjoy the benefits of the status quo, and can provide no logical arguments justifying the asymmetry between the way ILECs and competitive ETCs are treated under the rules. 10/ For example, GTE merely argues that the Commission should

7/ See Western Wireless Petition for Clarification or Rulemaking, CC Docket No. 96-45 (filed Oct. 15, 1998); Initial Comments at 12-13.

8/ Omnipoint at 1; CTIA at 13; Centennial Cellular, *passim*; AT&T at 5-7; Western Wireless agrees with AT&T's suggestion that the Commission implement a tracking mechanism to preclude ILECs from claiming, in subsequent data submissions, supported lines captured by competitive ETCs. AT&T at 6.

9/ Centennial Cellular at 4 (describing the competitive impact the two-year delay will have on Centennial); *see also id.* ("For Centennial, whose working loops in Puerto Rico have more than tripled during 1998, this gap [between what ILECs receive and what Centennial will receive] is highly significant . . . at least \$300,000 for the *first quarter* of 1999.") (emphasis in original).

10/ TDS at 6; SBC at 7; GTE at 20-22.

leave the rule alone because it has deferred changing the basis on which rural telephone companies are to receive funding. 11/ GTE's argument ignores the fact that, even during the period while rural telephone companies continue to receive funding based on the pre-existing system, the Commission has determined that support should be portable and available to competitive ETCs. 12/ Given that the rules apparently do not accurately implement this sound conclusion, the rules should be fixed expeditiously.

III. THE COMMISSION SHOULD RELY ON CONSUMER CHOICE TO DETERMINE THE LOCAL USAGE INCLUDED IN BASIC SERVICE PACKAGES

The parties' comments provide strong support for Western Wireless' contention that, in response to the Commission's question about "how much, if any, local usage [it] should require [ETCs] to provide to customers as part of a 'basic

11/ GTE at 21. Western Wireless agrees with GTE's statements that "a carrier's claim upon the fund should not be based on data from the previous year," *id.*, and that "the fund administrator should manage the fund on something closer to a real-time basis." *Id.* at 20. In addition, Western Wireless does not object to GTE's concrete suggestions for improving the rules, so long as those changes would apply to both ILECs and competitive ETCs. *Id.* at 22.

12/ *Federal-State Joint Board on Universal Service*, 12 FCC Rcd 8776, 8944-45, ¶¶ 311-313 (1997) ("*Universal Service Order*").

service' package," 13/ the best answer is "in short, none." 14/ This view is shared by a wide range of parties, including a number of incumbent LECs. 15/

First, a minimum usage requirement is unnecessary, and would impede consumers' ability to select universal service packages that best suit their needs. 16/ As Sprint PCS aptly observes, the question of local usage requirements

depends on the unique needs of each individual -- whether the person commutes to Omaha, is a farmer who spends the day in the field, a carpenter who spends the day at a construction site, a veterinarian or real estate agent who spend the day on the road, a mechanic who spends the day in the shop, or a telecommuter tied to his or her computer. 17/

Rather than imposing a paternalistic solution on consumers, the Commission should let consumers in the rapidly changing marketplace determine how local usage is packaged. As Sprint PCS observes:

if consumers have choices in their provider, there is no reason for the government to establish a minimum usage requirement for eligibility to receive universal service funding. In fact, government intervention into the type of service plans competitive carriers must offer will have the adverse effect of limiting consumer choices, distorting competition,

13/ FNPRM at ¶ 46.

14/ Initial Comments at 22.

15/ See Ameritech at 4-7; AT&T at 7-8; Sprint PCS at 7-16; Omnipoint Comments at 10; USTA Comments at 3; CTIA at 16.

16/ Western Wireless offered that "there are as many divergent needs for different types of local telecommunications service packages as there are different consumers." Initial Comments at 23.

17/ Sprint PCS at 14; *cf.*, Ohio Consumers' Counsel at 7 ("The difference in levels of support that each company's price point(s) will generate might provide different benefits for different providers, but that differential is not anti-competitive[.]").

and undermining Congress's directive in Section 254 and the [Act] generally. 18/

New entrants have every incentive to offer service packages including amounts of local usage that they believe consumers will want to buy, especially because new entrants can receive universal service funding only for signed subscribers. 19/

The Commission should therefore decline the invitation of some parties to substitute its own judgment for that of consumers in designing local service packages. 20/ U S West vastly underestimates the sophistication of today's telecommunications consumers when it argues that, "[i]f a wireless carrier who seeks designation as an [ETC] offers customers only a usage-sensitive service while the wireline carrier offers flat-rated local service with unlimited local usage, consumers would be unable to make a meaningful comparison[.]" 21/ Consumers can and do make these choices today for long distance and wireless services, and

18/ Sprint PCS at 8-9. *See also* GTE at 16 ("any requirement the Commission establishes should be designed to avoid interfering with the variety of different service packages and options that a competitive market would offer consumers").

19/ Ameritech at 5 ("Clearly, all carriers that offer 'access' to the network will also offer usage."); Sprint PCS at 10 ("Regulation of service plans that new entrants offer is not necessary because new entrants will succeed only if they offer better service and lower prices than incumbent carriers.").

20/ U S West at 10 ("the Commission should require wireless providers who seek designation as an [ETC] to offer a package of basic services which includes flat-rate local service with unlimited local usage"); *accord*, Ohio Consumers' Counsel at 2; NTCA at 6; SBC at 7.

21/ U S West at 16. Even the Ohio Counsel, with whose advocacy of a flat rate requirement Western Wireless disagrees, recognizes that when customers have a choice, they will select a service option that best serves their individual needs. Ohio Consumers' Counsel at 3.

there is no reason to doubt their competence to select among competitive local telecommunications options. 22/

Second, setting a minimum usage requirement would violate the basic principle of competitive and technological neutrality, largely “because of the difficulties in defining an appropriate level of local usage for wireless carriers and because of the differences in costs of providing local service between wireline and wireless services.” 23/ Ameritech cogently points out that “[i]t does not violate the princip[le] of competitive neutrality to permit carriers to structure their rates differently to accommodate different technologies that have different cost structures. . . . In a truly competitive market place, competitors with different technologies are free to implement different rate structures to coincide with their cost structures.” 24/

22/ See Sprint PCS at 8 (“Once competition develops, the regulation of service package content and rates becomes unnecessary because rural residents will have the freedom to choose the particular package that best suits its needs.”); AT&T Corp. at 7 (“one customer may determine that traditional ILEC service packages with unlimited local calling is most appropriate for his family’s calling needs. Another customer, however, might favor the mobility and wider local calling scopes offered by wireless carriers and be willing to sacrifice the unlimited landline usage option.”); *accord*, Omnipoint at 9-10.

23/ USTA at 3; *see also* GTE at 13 (“Wireless carriers generally do not offer unlimited flat calling, but they do offer a wide array of usage packages at different prices. It is very difficult, therefore, to select a usage requirement that will be competitively neutral.”); CTIA at 15 (“[u]nlimited local usage [would] serve as a barrier to the use of spectrum-based technologies in universal service programs[.]”).

24/ Ameritech at 6; *see also* Ohio Consumers’ Counsel at 5-6 (recognizing need for universal service funds to support a variety of usage patterns).

By contrast, the parties calling for minimum usage requirements display their disregard for the goals of competitive and technological neutrality. SBC, for example, baldly argues that “support should only be drawn for those subscribing to the basic service package” in order to prevent distribution of “subsidies for customers who are subscribing to regular wireless rate plans” 25/ This argument presupposes that wireless service offerings in high-cost areas are inherently, and always will be, “secondary” to “basic” wireline service. This view of the world is completely contrary to the fundamental proposition, repeatedly endorsed by the Commission, that wireless services can compete fully with, and can be a substitute (not just a complement) to, wireline local service. 26/

It is particularly notable that, among the parties advocating minimum local usage requirements, there is no consensus regarding the appropriate amount of minutes, or how to quantify this measure, for purposes of setting this

25/ SBC at 8.

26/ *Application of 360° Communications Co., and Alltel Corp.*, DA 98-2637, ¶ 13 (released Dec. 30, 1998) (“evidence is mounting that carriers using wireless technologies may soon, if they do not do so already, compete with wireline-based carriers for customers and business in local exchange and exchange access markets”) (citing *Implementation of Section 6002(b) of the Omnibus Budget Reconciliation Act of 1993*, FCC 98-91, Third Report and Order, PP 26-27 (released June 11, 1998)); see also *1998 Biennial Regulatory Review --Spectrum Aggregation Limits for Wireless Telecommunications Carriers*, WT Docket No. 98-205, NPRM, 13 C.R. (P&F) 20-2729, ¶ 5 (1998) (“We are [] committed to bringing competition to local telecommunications markets generally, consistent with the central Congressional mandate of the 1996 Act [and] wish to ensure that there are no regulatory impediments to the evolution of wireless carriers into more effective competitors vis-à-vis the local wireline telephone companies.”) (citations omitted).

requirement. Indeed, no party can suggest any meaningful or principled *competitively and technologically neutral* way to reach such a determination. 27/ Thus, the Commission should refrain from adopting *any* minimum local usage requirement.

IV. CMRS PROVIDERS SHOULD COMPUTE THEIR INTERSTATE SHARE OF REVENUES IN THE MANNER PROPOSED BY CTIA

Western Wireless agrees with the Cellular Telecommunications Industry Association ("CTIA") that the Commission should establish a fixed percentage for wireless carriers to allocate their telecommunications revenues to the interstate jurisdiction for purposes of their contribution to the universal service program. We also concur with CTIA and PCIA that, whatever percentage is chosen, the Commission should allow wireless carriers to use the data they collect from their own operations for calculating the amount of their universal service contribution. 28/ Western Wireless also agrees with CTIA that in no event should the Commission assess the amount of contributions to the universal service program for wireless providers on a flat-fee basis.

27/ See, e.g., GTE at 13-17; AT&T at 8 ("establishing the minimum local usage level is a daunting task" and "[i]t would likely be impossible to establish a local usage requirement that did not advantage once class of carriers and simultaneously preclude the provision of universal service by another class."); see also Initial Comments at 21-26.

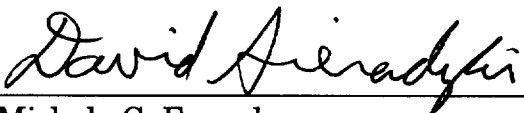
28/ CTIA at 4; PCIA at 7.

V. CONCLUSION

The Commission should take the actions recommended in these Reply Comments and Western Wireless' Initial Comments in response to the FNPRM, which would ensure a competitively neutral universal service environment that facilitates competitive entry into high-cost and rural areas by carriers such as Western Wireless and other CMRS providers.

Respectfully submitted,

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Dated: January 25, 1999

CERTIFICATE OF SERVICE

I, Cecelia Burnett, hereby certify that on this 25th day of January, 1999, copies of Western Wireless Corporation's Reply Comments on Further Notice of Proposed Rulemaking of the Joint Board on Universal Service were served on the parties listed below by hand delivery or first class mail.



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